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Cc: [Jones, Sally](#); [Peachey, Bryan](#); [Blarr, Steve](#); [Devorak, Coleen](#)
Subject: Hatco quarterly progress report 45
Date: Wednesday, January 04, 2017 10:37:58 AM
Attachments: [2017-01-04 Weston EPA-Progress Rpt 45.pdf](#)

All,

A copy of the Hatco quarterly progress report is attached for your information. Let me know if you need a hard copy.

Thanks,

Jason

Jason Schindler

Principal Project Manager

Weston Solutions, Inc.

205 Campus Drive

Edison, NJ 08837

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VIA FEDEX

January 4, 2017

Ms. Susan Schulz, Toxics Section Chief
U.S. EPA Region II
Pesticides & Toxic Substances Branch
2890 Woodbridge Avenue
Bldg. 10 (MS-105)
Edison, NJ 08837-3679

Mr. John M. Mitch, Clerk
Woodbridge Township
1 Main Street
Woodbridge, NJ 07095

Re: Hatco Site
Fords, NJ
Program Interest Number G000003943

Dear Ms. Schulz and Mr. Mitch:

Weston Solutions, Inc. (Weston) is forwarding Progress Report Number 45, which covers the activities associated with the Hatco Site from September 1 through November 30, 2016. The progress report is being submitted in accordance with the requirements of Weston's May 25, 2005 Administrative Consent Order and March 30, 2005 EPA approval letter. If you have any questions, please do not hesitate to contact me at (732) 417-5804.

Very truly yours,
WESTON SOLUTIONS, INC.



Jason Schindler
Principal Project Manager

cc: A. Findley (NJDEP)
M. Fisher – LSRP (ELM)
R. Ansari, A. Martin, K. Etela (Hatco/Chemtura)
K. Aiello (MCUA)
V. Puranapanda, S. Piatkowski, C. Stella, S. Anthony (Chubb)
File No. 2.5



ADMINISTRATIVE CONSENT ORDER PROGRESS REPORT

1. Progress Report Number: 45
2. Site Location: Hatco Site
 1020 King Georges Post Road
 Fords, NJ 08863
3. Signatories: Weston Solutions, Inc.
 ACE American Insurance Company
 New Jersey Department of Environmental Protection
4. Reporting Period: September 1 through November 30, 2016
5. Specific Requirements Initiated and Completed During Reporting Period:
 - 5.1 Weston submitted Progress Report No. 44 on October 4, 2016.
 - 5.2 Weston provided monthly email updates to the United States Environmental Protection Agency (USEPA) on October 5 and December 6, 2016.
 - 5.3 Weston completed the evaluation of elevated vapor and combustible gas encountered at the recovery wells. Engineering and administrative controls have been put into place to allow the recovery work to continue. Changes include upgraded personal protective equipment, use of hot work permits at the facility, establishment of a dedicated fire watch and bonding and grounding for certain of the light non-aqueous phase liquid (LNAPL) recovery operations. Manual recovery operations resumed in December and will be reported in the next quarterly progress report. The automated recovery system is scheduled to be restarted in the spring.
 - 5.4 The Northeast Impoundment (NEI) remediation project was completed as of June 24, 2016. During the remediation, erosion was observed along the bank of Slingtail Creek. While this erosion was unrelated to the remediation activities, a limited area along the northeast corner of the NEI cap will require additional erosion protection to prevent future erosion from undermining the cap. Weston met with the New Jersey Department of Environmental Protection (NJDEP) in December and is currently preparing required permit applications to construct the erosion protection system.
 - 5.5 On August 30, 2016 Weston received comments from NJDEP regarding the Remedial Investigation Report (RIR) that was submitted in May. NJDEP's comments focused on contaminated sediment delineation in Slingtail Creek and the Channel D area. Weston provided its response to comments on November 7, 2016 and requested a meeting with NJDEP to go over any remaining issues.
 - 5.6 The annual wetland monitoring report was completed and submitted to NJDEP on December 7, 2016. During this monitoring period a portion of the restored wetlands was cleared by Middlesex Water Company, as part of their utility maintenance program. Weston contacted Ms. JoDale Legg at NJDEP and documented this condition in the report.



6. Specific Requirements Previously Initiated Which are Continuing:

- 6.1 As noted above, LNAPL recovery operations were temporarily halted. LNAPL at the site is contained by the cut-off wall and recovery trenches; the mobile LNAPL downgradient of the containment was fully removed during the Southeast Leg remedial action. Manual recovery operations resumed in December.
- 6.2 Weston continued development of Remedial Action Work Plan (RAWP) Addendum 4 for Woodbridge Pond. Pending agreement on the conceptual approach by the owner, Licensed Site Remediation Professional (LSRP) and USEPA, Weston will prepare the draft RAWP Addendum. Weston met with the property owner, Woodbridge Township, in December to go over the remediation approach.
- 6.3 Preparation of draft remediation report documentation for LSRP review and approval and monthly progress meetings with the LSRP.
- 6.4 Evaluation of conceptual remediation approaches for Channel D, incorporating responses to NJDEP comments on sediment delineation. Weston is awaiting a response from NJDEP to resolve any remaining issues regarding sediment delineation in Channel D and adjacent areas identified as AOC-25.
- 6.5 The Southeast Leg Remediation was completed. Final wetland restoration plantings and minor repairs were completed in December and will be documented in the next progress report. Weston is currently preparing a Remedial Action Progress Report to document the work completed.
- 6.6 In July, Weston completed the application of a temporary stabilizing agent (Soiltac) on the Former Lagoon area to extend the functional lifespan of the temporary cover until final capping can be implemented. Weston is conducting monthly inspections to verify that the temporary cover is functioning properly. Minor erosion was noted during the inspection in November and repairs were scheduled for December. Weston will provide the final cap design to USEPA for review.

7. Specific Requirements Scheduled for Completion, but not Completed During the Reporting Period:

- 7.1 Preparation of RAWP Addendum 4
- 7.2 Resumption of LNAPL recovery operations

8. Explanation for Each Item of Non-Completion in Item 7:

- 8.1 Completion of the RAWP Addendum 4 was postponed pending approval of the remediation approach by the Woodbridge Pond property owner and USEPA. Weston met with the property owner in December and we expect to provide the revised plans shortly.
- 8.2 Weston completed engineering the solution that will allow recovery efforts to proceed. Operations resumed in December, just after the end of this reporting period.

9. Specific Requirements to be Initiated in Next Reporting Period (December 2016 – February 2017):

- 9.1 Prepare RAWP Addendum 4 for Woodbridge Pond remediation, pending owner and regulatory approval of the technical approach.



- 9.2 Update scope and schedule for Woodbridge Pond and Channel D remediation, pending resolution of delineation with NJDEP.
- 9.3 Resume LNAPL recovery operations.
- 9.4 Prepare Southeast Leg Remedial Action Progress Report.
- 9.5 Prepare NEI Remedial Action Progress Report
- 9.6 Prepare engineering plan for site-wide capping of remaining contaminated soil and permanent capping of the Former Lagoon Area.
- 9.7 Prepare permit application for streambank erosion protection system at NEI.

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